

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

GAIL DINES,
Plaintiff,

v.

WHEELOCK COLLEGE,
a corporation, JACKIE JENKINS-SCOTT, in
her official and individual capacities,
KATHERINE S. TAYLOR, in her official and
individual capacities; and KINGSTON BAY
GROUP, a limited liability corporation,
Defendants.

C.A. No. 1:16-cv-11876-GAO

**NOTICE OF INTENT TO FILE OPPOSITION TO PLAINTIFF'S MOTION FOR
ADMISSION OF VISITING LAWYER *PRO HAC VICE***

Defendants Wheelock College, Jackie Jenkins-Scott, and Katherine S. Taylor (collectively, the "Defendants"), by and through undersigned counsel, hereby give notice of their intent to oppose the "Motion for Admission of Visiting Lawyer Pro Hac Vice" (the "Motion") filed by Plaintiff's attorney, Anita Vadgama. By the Motion, Attorney Vadgama seeks permission for Dr. Ann Olivarius to appear *pro hac vice* as counsel for Plaintiff.¹

Defendants intend to oppose the Motion because, *inter alia*, Dr. Olivarius has been suspended and/or disqualified from the practice of law in multiple jurisdictions in recent years. Dr. Olivarius omits any mention of that discipline from her affidavit in support of the Motion. In addition, Dr. Olivarius has engaged in conduct violative of the Massachusetts Rules of Professional Responsibility, namely by directly communicating with clients represented by undersigned counsel on at least two occasions. Further, in an example of the continuing failure

¹ In two other pending matters against Wheelock College, Jackie Jenkins-Scott, and Ms. Taylor, Attorney Vadgama also filed *pro hac vice* motions on behalf of Dr. Olivarius today. See *Eric Silverman v. Wheelock College, et al.*, No. 1:16-cv-11879-GAO, Doc. 12; *Joan Gallos v. Wheelock College et al.*, No. 1:15-cv-11884-MLW, Doc. 11. Defendants intend to oppose Dr. Olivarius's *pro hac vice* admission in those matters as well.

of Plaintiff's counsel to comply with the applicable rules governing the practice of the law in Massachusetts, Attorney Vadgama filed the Motion without conferring with Defendants, as required by Local Rule 7.1(a)(2).

Defendants respectfully request that the Court defer ruling on the Motion until the Defendants have filed their opposition within the time frame set forth by the rules.

**WHEELOCK COLLEGE, JACKIE
JENKINS-SCOTT, and KATHERINE S.
TAYLOR**

By their attorneys,

/s/ Scott A. Roberts
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Dated: October 27, 2016

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on October 27, 2016.

/s/ Scott A. Roberts
Scott A. Roberts